

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;

UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**PLAINTIFF'S NOTICE OF INTENT TO FILE A REPLY OR TO FILE MOTION FOR LEAVE
TO FILE A REPLY TO THE DONAIS DEFENDANTS' OBJECTION TO PLAINTIFFS' MOTION
FOR LIMITED DISCOVERY PERTAINING TO THE PLAINTIFF'S MOTION TO AMEND THE
COMPLAINT**

1. I hereby provide this notice of my intent to file a reply or a motion for leave to file a reply to **DONAIS DEFENDANTS' OBJECTION TO PLAINTIFF'S MOTION FOR LIMITED DISCOVERY PERTAINING TO DEFENDANTS' OBJECTION TO MOTION TO AMEND COMPLAINT**, pursuant to local rule 7.1(e)(1) & (2).
2. I hereby preserve the right to reply within the time prescribed by the rules. This was not an emergency motion and so rushing to rule on this motion without allowing time for a reply or precluding me from responding will be a harm to me.
3. I ask that the court wait the proper time under the files for me to file a reply or motion to reply.
4. I plan to file the replies pertaining to the motion to amend the complaint today and have no time to properly read or respond to this objection. NB: I did not file a request for an extension of this deadline and it was pure speculation for the defendants (or anyone else) to purport otherwise that this was my intention. If that was my intent, I would have explicitly requested it prior today or at least by now (4pm on 5-13-24), which shows no intent to do so.
5. I intend to properly refute, rebut, and show the statements of the Donais defendants in my reply.
6. I ask the court to await this reply or motion pursuant to Local Rule 7.1(e)(1) or (2).

Respectfully submitted,

/s/Andre Bisasor

Plaintiff Andre Bisasor

May 13, 2024

CERTIFICATE OF SERVICE

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor

Andre Bisasor